# DRAFT FINDING OF NO SIGNIFICANT IMPACT

#### 1 Introduction

Fort Benning has prepared an Environmental Assessment (EA) to evaluate the potential environmental effects associated with the relocation of the N61919 Navy Operational Support Center (NOSC), or NOSC Columbus, from its current location in downtown Columbus, Georgia (GA) to Army Installation Fort Benning, GA. This EA was prepared in accordance with the National Environmental Policy Act (NEPA), the Council on Environmental Quality Regulations at 40 Code of Federal Regulations (CFR) Parts 1500-1508, and the Army NEPA Regulation32 CFR Part 651 (*Environmental Analysis of Army Actions*). This EA will also provide the basis for determining if a Finding of No Significant Impact (FNSI) is appropriate, or if an Environmental Impact Statement (EIS) is required in accordance with the above regulations.

## 2 Background

## Naval Operational Support Center

The NOSC Columbus is one of many Naval Reserve Centers located throughout the nation providing reservist both administrative and training facilities. NOSCs are staffed by Navy Full Time Support personnel whose primary role is supporting the Navy Selected Reserve; the largest cohort of Navy Reserve Sailors who traditionally drills one weekend each month and two weeks annually. The NOSC Columbus is currently located south of Victory Drive/U.S.-280 within the South Commons Municipal Complex; approximately five miles northwest of Fort Benning.

### Fort Benning

Fort Benning is an Army Installation located outside Columbus, GA, which supports more than 120,000 Active Duty military, Family members, reserve component Soldiers, retirees, and Army civilian employees on a daily basis. Fort Benning plays a pivotal role in supporting the Army's overarching mission by providing the institutional training of Infantry and Armor Soldiers and leaders, basic and advanced individual training of new enlistees, and functional training in special skills needed to support the operating forces. Additionally, Fort Benning serves as the home to numerous deployable Army and other tenant units.

### 3 Purpose and Need

The purpose is to fulfill a Stationing Action request on behalf of NOSC Columbus and the U.S. Navy through the Installation providing existing facilities or by constructing a new NOSC building and accompanying parking area for Navy Drill Reservists. Such facilities are undersized and improperly configured for the present mission and essential training needs of the NOSC. Furthermore, the current facilities do not meet Anti-Terrorism/Force Protection (AT/FP) standards; Department of Defense (DoD) Instruction 2000.12 (Department of Defense, 2012). All replacement facilities must

comply with AT/FP, UFC requirements and other DoD Directives. A support service and utilities agreement will be required between the NOSC and the U.S. Army once facilities are occupied.

### 4 Description of the Proposed Action

The Proposed Action would serve to replace the NOSC's current facilities with on-Post (Fort Benning) constructed facilities and includes the relocation and operation of the NOSC from its current location near downtown Columbus, GA to Fort Benning, GA. From 2012 to 2014, the U.S. Navy and Army coordinated and approved through a Stationing Action, Army Regulation 5-10, for the relocation of the NOSC Columbus to Fort Benning. Fort Benning has been tasked to complete the Stationing Action for the Navy and provide approximately 21,000 square feet of building space and 36,000 square feet of paved parking in accordance with the NOSC's requirements under the UFC and the Department of Defense Directive 4270.5 for Military Construction.

# 5 Description of the Alternatives

Army and NEPA regulations require the development and consideration of the Proposed Action and appropriate alternatives. The Alternative Analysis Process evaluates alternative means of meeting the purpose and need for the Proposed Action. Fort Benning developed the screening criteria to be measured against the alternatives in an effort to narrow down alternatives for further analysis. Any alternatives that failed to meet the following criteria were eliminated from further analysis. Alternatives to construct a new NOSC are required to:

- Be within Fort Benning's Installation's boundary and in close proximity to essential services and facilities to prevent hindering their mission through excessive personnel commuting distances;
- Be available for development (little to no ground prep or demolition required);
- Have the capability for compliance with AT/FP requirements of UFC 4-010-01.
- Accommodate at a minimum a 21,000 square foot building and provide 36,000 square feet of paved parking along with additional AT/FP setbacks and potential utility right-of-ways and environmental control structures;
- Not significantly affect environmental resources;
- Not require excessive costs for potential renovation or construction and operations and maintenance.

Two Alternatives were determined to be reasonable:

Alternative 1: Soldiers Plaza (Preferred Alternative)
 Alternative 1 is the preferred alternative and would result in the relocation of the NOSC to Fort Benning's Main Post at Soldiers' Plaza (Figure 2-1), and associated construction maintenance and operation. Soldiers' Plaza is located south off Dixie Road and is a 15 acre parcel available for immediate

development and currently designated for administrative and support facilities. Fort Benning would make approximately half of the parcel available to the NOSC for construction, operation, and maintenance. At present, facility configuration and design is unknown; therefore, Alternative 1 analysis includes the entire parcel.

The parcel contains approximately 35 World War II era wooden buildings originally built as barracks. With the exception of the actual NOSC building structure, all necessary infrastructure and utilities are readily available. Primarily, it currently functions as "in processing" facilities; however, the current facilities are scheduled for demolition in late 2015. Future facilities planned to coexist with the NOSC include Soldier Family Support Center. This demolition and action is further discussed in section 3.1.3 under past, present, and reasonably foreseeable actions within the region of influence.

Alternative 1's proposed location is considered to be the best option as it would be more accessible for commuters during peak hours of traffic flow. Other improvements include approximately 50 paved parking spaces on the western and southern margin of the property. Alternative 1 would meet the purpose and need for the Proposed Action and is considered reasonable according to the screening criteria.

### Alternative 2: Bradshaw Road Site, Fort Benning

The selection of Alternative 2 would result in the relocation, operation and maintenance of the NOSC to Fort Benning's Main Post within what is currently a parcel utilized as open green space (Figure 2-2). The Bradshaw Road Site is located on the corner of Bradshaw Road and Goltra Avenue east of Lawson Army Airfield and is an open six acre parcel available for immediate development. Necessary utilities are available, but no other improvements exist. Alternative 2 would likewise meet the purpose and need for the Proposed Action and is considered reasonable according to the screening criteria.

### No Action Alternative

Under the No Action Alternative, the NOSC Columbus would not relocate to Fort Benning, GA. Navy personnel would continue to utilize the existing NOSC facilities leased from the City of Columbus, GA. The undersized and functionally inadequate facilities would continue to impact the current mission and training demands. Additionally, the NOSC, at its current location, would continue to operate in facilities that would not meet AT/FP requirements.

While the No Action Alternative would not satisfy the purpose of or need for the Proposed Action, the No Action Alternative reflects the "status quo" and served as a benchmark against which the Action Alternative was evaluated.

## 6 Anticipated Environmental Effects

The analysis contained in this EA indicates that for the most part, implementation of the Proposed Action for either action alternative would have only short-term, minor adverse effects to Air Quality, Soils, and Water Resources due to construction associated with all of the Action Alternatives. Long-term beneficial effects on both air quality and safety and security would occur. Air quality would benefit through the utilization of more energy efficient facilities constructed. Safety and security would benefit as related to force protection and the NOSC's relocation/operation on Fort Benning. Adherence to applicable Federal and State laws, regulations, and GA NPDES and Air Rule BMPs would minimize impacts due to construction and operation related activities.

## 7 Mitigation Measurements

No mitigation measures are required to avoid significant impacts under any of the Proposed Action alternatives. Additional mitigations identified within the EA are only implemented to mitigate minor and moderate, adverse impacts.

### 8 Public Availability

The Final EA and Draft FNSI were made available to the public for a 30-day public comment period from August 6 – September 8, 2015. An announcement that these documents are available was published via a Notice of Availability (NOA) in The Columbus Ledger-Enquirer, The Tri-County Journal, and Fort Benning's The Bayonet and Saber in accordance with the Army NEPA Regulation. These documents are also available at several local libraries and are posted on the Fort Benning website at http://www.benning.army.mil/garrison/DPW/EMD/legal.htm. The NOA of the Final EA and Draft FNSI has been mailed to all agencies/individuals/organizations on the Fort Benning NEPA distribution (mailing) list for the Proposed Action. As part of Fort Benning's on-going, established process and dialogue with the Federally recognized Native American Tribes affiliated with the Fort Benning area, the Army has provided each Tribe with a copy of these documents for consultation via review and comment.

#### 9 Conclusions

I have considered the results of the analysis in the EA, comments received within the public review period, and details within the Stationing Action for the relocation of the NOSC Columbus to Fort Benning. Based on these factors, I have decided to implement the Preferred Alternative (Alternative 1) at Fort Benning by selecting the Soldiers' Plaza site for the relocation and operation of the NOSC facilities. Implementation of the Preferred Alternative will not have a significant impact on the quality of human life or natural environment.

Implementing Alternative 2 (Bradshaw Road Site) also would not have a significant impact on the quality of human life or the natural environment. However, Alternative 2

would be less desired comparison with Alternative 1's commuter accessibility and existing infrastructure available.

This analysis fulfills the requirements of the NEPA of 1969, as implemented by the Council on Environmental Quality regulations (40 CFR 1500–1508), as well as the requirements of the Environmental Analysis of Army Actions (32 CFR 651). Therefore, issuance of a FNSI for both Proposed Action alternatives is warranted and an EIS is not necessary.

FINDING OF NO SIGNIFICANT IMPACT REVIEWED AND APPROVED BY:	
Date	ANDREW C. HILMES
	Colonel, Armor
	Garrison Commander